

Caption in compliance with D.N.J. LBR 9004-1(b)

Norgaard, O'Boyle & Hannon

184 Grand Avenue

Englewood, NJ 07631

(201) 871-1333

Attorneys for Debtor-in-Possession

By: *John O'Boyle, Esq. (JO - 6337)*

joboyale@norgaardfirm.com

In Re:

STEPHEN J. CONTE, JR.,

Debtor.

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK VICINAGE

Chapter 11

Case No. 18-29278 JKS

Hearing Date: October 29, 2019

**CERTIFICATION IN OPPOSITION TO THE MOTION OF THE UNITED STATES
TRUSTEE TO DISMISS OR CONVERT CASE**

John O'Boyle, Esq. certifies as follows:

1. I am a member of Norgaard, O'Boyle & Hannon, counsel to the debtor herein. I make this certification in opposition to the motion of the United States Trustee to Dismiss or convert the above-captioned case.

2. Since the conversion of the case to Chapter 11, the Debtor has retained an accountant to prepare and file his 2013 – 2018 tax returns, as well as the returns of his companies. Through this case, he seeks to determine and address his tax debts, and to resolve the defaulted mortgage covering his family's home.

3. The Debtor and his accountant have confirmed that on October 12, 2019, the Debtor filed his tax returns from 2013 – 2018.

4. Also since receiving the US Trustee's motion, through my office the Debtor provided the US Trustee with the following items it seeks:

- A. copies of his personal State and Federal Tax returns from 2016 – 2018;
 - B. copies of the most recently filed tax returns for Rochamus Medical Equipment Corp.; Vestibula Diagnostics, PA; and 396 Medical Management Corp.
 - C. proof of opening of a DIP account in October, 2019;
 - D. copies of the deed and affidavit of title relating to his acquisition of an interest in the 395 North Farview Avenue. Paramus, NJ real estate;
 - E. copies of documents relating to his life insurance policy.
6. The Debtor anticipates that prior to the hearing on this motion he will provide the US Trustee with a copy of the required certificate of insurance and an appraisal for the real estate. Further, he expects to file operating reports for May, 2019 through August, 2019 prior to the hearing.

I certify that the foregoing statements are true. I am aware that if the foregoing statements are willfully false, I am subject to punishment.

Dated: 10/22/19

/s/ John O'Boyle

John O'Boyle, Esq.